



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
MONTGOMERY COUNTY
Application No: 08-3799**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: November 17, 1999

Printing Service Company, Inc.
Steve Zick
630-52 South Main Street
Dayton, OH 45402

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
REGIONAL AIR POLLUTION CONTROL AGENCY



FINAL PERMIT TO INSTALL 08-3799

Application Number: 08-3799

APS Premise Number: 0857043139

Permit Fee: **\$600**

Name of Facility: Printing Service Company, Inc.

Person to Contact: Steve Zick

Address: 630-52 South Main Street
Dayton, OH 45402

Location of proposed air contaminant source(s) [emissions unit(s)]:
**630-52 South Main Street
Dayton, Ohio**

Description of proposed emissions unit(s):
NON-HEATSET OFFSET LITHOGRAPHIC PRINTING PRESSES #381; #387; AND #389.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NODES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

Printing Service Company, Inc.

PTI Application: **08-3799**

November 17, 1999

Facility ID: **0857043139**

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	38.12

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Press #381, Heidelberg 28" x 40", 5-color, non-heatset sheetfed offset, lithographic printing press	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(9)(c)	46.3 lbs OC/day, 3.86 TPY OC See A.2.b

2. Additional Terms and Conditions

- 2.a The 46.3 pounds of OC per day limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- 1. Pursuant to Ohio EPA Engineering Guide #68, if the permittee assumes a 50% reduction in organic compound emissions for cleanup materials, then the permittee shall store used shop towels in closed containers.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for the entire facility for the purposes of determining the annual organic compound emissions:
 - a. the name and identification for each ink/varnish, fountain solution and cleanup material employed;
 - b. the number of gallons of each ink/varnish, fountain solution and cleanup material employed;
 - c. the organic compound content of each ink/varnish, fountain solution and cleanup material employed, in pounds per gallon;

- d. the total potential organic compound emission rate for all the inks/varnishes, fountain solutions and cleanup materials, in pounds, for this emissions unit (i.e. the sum of the number of gallons of each material in b. x the material's respective OC content in c.).
- e. the actual organic compound emission rate, in pounds, as calculated in Section E.1.b*.

*Pursuant to Ohio EPA Engineering Guide #68, the following assumptions will be used in calculating the actual OC emissions for this emissions unit: 95% of the ink/varnish solvent is retained in the web and the remaining 5% is released to the atmosphere; 100% of the fountain solution solvent is released to the atmosphere; for any cleanup material with a vapor pressure less than 10 mm Hg at 20 degrees Celsius, which is applied with shop towels, and the towels are stored within a closed container, 50% of the solvent in the cleanup material is retained within the towel and the remaining 50% is released to the atmosphere - otherwise, 100% of the solvent in the cleanup material is released to the atmosphere.

2. The permittee shall determine if each liquid organic material (including but not limited to inks/varnishes, fountain solutions and cleanup materials), employed by this emissions unit, is photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The permittee shall collect and record the aforementioned information each month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (District Office or Local Air Agency) within 30 days of the deviation.
2. The permittee shall submit annual reports which specify the total organic compound emissions for this emissions unit for the previous calendar year. These reports shall be submitted to the Director (District Office or Local Air Agency) by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation in Section II.A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
46.3 pounds of OC per day

Applicable Compliance Method -
Compliance shall be based upon the maximum hourly OC emission rate for this emissions unit, 1.93 lbs/hr, multiplied by the maximum operating hours per day, 24.0 hours.

- b. Emission Limitation -
3.86 tons OC per year

Applicable Compliance Method -

- i. The total potential organic compound emission rates for inks and varnishes (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a solvent loss factor of 0.05*, for 5% solvent loss.
- ii. The total potential organic compound emission rates for the fountain solution and all other liquid organic materials (in pounds), excluding ink/varnish and cleanup, as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 1.0, for 100% solvent loss.
- iii. The total potential organic compound emission rate from the cleanup materials (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 0.5**, for 50% solvent loss.
- iv. The total annual organic compound emission rate shall be the sum of the result from (i), (ii) and (iii), divided by 2,000 pounds per ton, and the result shall be multiplied by the allocation factor (0.08) for this emissions unit, as determined by the Printing Industry of Ohio's "Enviroprint" manual. .

*Pursuant to Ohio EPA Engineering Guide #68, lithographic sheetfed and non-heatset inks have a 5% solvent loss.

** Pursuant to Ohio EPA Engineering Guide #68, cleanup operations can assume 50% solvent loss if the cleanup towels are stored in closed containers and the cleanup solvents have a composite vapor pressure less than 10 mm of Hg at 20 degrees Celsius (68 deg. F). If either of the aforementioned do not apply, then the permittee shall assume 100% solvent loss for the affected cleanup material.

2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, varnishes, fountain solutions and cleanup materials.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Press #387, Planeta 40" x 55", 6-color, non-heatset sheetfed offset, lithographic printing press	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(9)(c)	111.6 lbs OC/day, 17.44 TPY OC See A.2.b

2. **Additional Terms and Conditions**

- 2.a The 111.6 pounds of OC per day limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

1. Pursuant to Ohio EPA Engineering Guide #68, if the permittee assumes a 50% reduction in organic compound emissions for cleanup materials, then the permittee shall store used shop towels in closed containers.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility for the purposes of determining the annual organic compound emissions:
 - a. the name and identification for each ink/varnish, fountain solution and cleanup material employed;
 - b. the number of gallons of each ink/varnish, fountain solution and cleanup material employed;
 - c. the organic compound content of each ink/varnish, fountain solution and cleanup material employed, in pounds per gallon;

- d. the total potential organic compound emission rate for all the inks/varnishes, fountain solutions and cleanup materials, in pounds, for this emissions unit (i.e. the sum of the number of gallons of each material in b. x the material's respective OC content in c.).
- e. the actual organic compound emission rate, in pounds, as calculated in Section E.1.b*.

*Pursuant to Ohio EPA Engineering Guide #68, the following assumptions will be used in calculating the actual OC emissions for this emissions unit: 95% of the ink/varnish solvent is retained in the web and the remaining 5% is released to the atmosphere; 100% of the fountain solution solvent is released to the atmosphere; for any cleanup material with a vapor pressure less than 10 mm Hg at 20 degrees Celsius, which is applied with shop towels, and the towels are stored within a closed container, 50% of the solvent in the cleanup material is retained within the towel and the remaining 50% is released to the atmosphere - otherwise, 100% of the solvent in the cleanup material is released to the atmosphere.

2. The permittee shall determine if each liquid organic material (including but not limited to inks/varnishes, fountain solutions and cleanup materials), employed by this emissions unit, is photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The permittee shall collect and record the aforementioned information each month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (District Office or Local Air Agency) within 30 days of the deviation.
2. The permittee shall submit annual reports which specify the total organic compound emissions for this emissions unit for the previous calendar year. These reports shall be submitted to the Director (District Office or Local Air Agency) by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation in Section II.A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
111.6 pounds of OC per day

Applicable Compliance Method -

Compliance shall be based upon the maximum hourly OC emission rate for this emissions unit, 4.65 lbs/hr, multiplied by the maximum operating hours per day, 24.0 hours.

- b. Emission Limitation -
17.44 tons OC per year

Applicable Compliance Method -

- i. The total potential organic compound emission rates for inks and varnishes (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a solvent loss factor of 0.05*, for 5% solvent loss.
- ii. The total potential organic compound emission rates for the fountain solution and all other liquid organic materials (in pounds), excluding ink/varnish and cleanup, as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 1.0, for 100% solvent loss.
- iii. The total potential organic compound emission rate from the cleanup materials (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 0.5**, for 50% solvent loss.
- iv. The total annual organic compound emission rate shall be the sum of the result from (i), (ii) and (iii), divided by 2,000 pounds per ton, and the result shall be multiplied by the allocation factor (0.289) for this emissions unit, as determined by the Printing Industry of Ohio's "Enviroprint" manual. .

*Pursuant to Ohio EPA Engineering Guide #68, lithographic sheetfed and non-heatset inks have a 5% solvent loss.

** Pursuant to Ohio EPA Engineering Guide #68, cleanup operations can assume 50% solvent loss if the cleanup towels are stored in closed containers and the cleanup solvents have a composite vapor pressure less than 10 mm of Hg at 20 degrees Celsius (68 deg. F). If either of the aforementioned do not apply, then the permittee shall assume 100% solvent loss for the affected cleanup material.

2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, varnishes, fountain solutions and cleanup materials.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Press #389, Harris 44" x 60", 7-color, non-heatset sheetfed offset, lithographic printing press	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(G)(9)(c)	108.0 lbs OC/day, 16.88 TPY OC See A.2.b

2. Additional Terms and Conditions

- 2.a The 108.0 pounds of OC per day limitation was established to reflect potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with this limit.
- 2.b The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

1. Pursuant to Ohio EPA Engineering Guide #68, if the permittee assumes a 50% reduction in organic compound emissions for cleanup materials, then the permittee shall store used shop towels in closed containers.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility for the purposes of determining the annual organic compound emissions:
 - a. the name and identification for each ink/varnish, fountain solution and cleanup material employed;
 - b. the number of gallons of each ink/varnish, fountain solution and cleanup material employed;
 - c. the organic compound content of each ink/varnish, fountain solution and cleanup material employed, in pounds per gallon;

- d. the total potential organic compound emission rate for all the inks/varnishes, fountain solutions and cleanup materials, in pounds, for this emissions unit (i.e. the sum of the number of gallons of each material in b. x the material's respective OC content in c.).
- e. the actual organic compound emission rate, in pounds, as calculated in Section E.1.b*.

*Pursuant to Ohio EPA Engineering Guide #68, the following assumptions will be used in calculating the actual OC emissions for this emissions unit: 95% of the ink/varnish solvent is retained in the web and the remaining 5% is released to the atmosphere; 100% of the fountain solution solvent is released to the atmosphere; for any cleanup material with a vapor pressure less than 10 mm Hg at 20 degrees Celsius, which is applied with shop towels, and the towels are stored within a closed container, 50% of the solvent in the cleanup material is retained within the towel and the remaining 50% is released to the atmosphere - otherwise, 100% of the solvent in the cleanup material is released to the atmosphere.

2. The permittee shall determine if each liquid organic material (including but not limited to inks/varnishes, fountain solutions and cleanup materials), employed by this emissions unit, is photochemically reactive material as defined in OAC rule 3745-21-01(C)(5). The permittee shall collect and record the aforementioned information each month.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (District Office or Local Air Agency) within 30 days of the deviation.
2. The permittee shall submit annual reports which specify the total organic compound emissions for this emissions unit for the previous calendar year. These reports shall be submitted to the Director (District Office or Local Air Agency) by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation in Section II.A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
108.0 pounds of OC per day

Applicable Compliance Method -

Compliance shall be based upon the maximum hourly OC emission rate for this emissions unit, 4.5 lbs/hr, multiplied by the maximum operating hours per day, 24.0 hours.

- b. Emission Limitation -
16.88 tons OC per year

Applicable Compliance Method -

- i. The total potential organic compound emission rates for inks and varnishes (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a solvent loss factor of 0.05*, for 5% solvent loss.
- ii. The total potential organic compound emission rates for the fountain solution and all other liquid organic materials (in pounds), excluding ink/varnish and cleanup, as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 1.0, for 100% solvent loss.
- iii. The total potential organic compound emission rate from the cleanup materials (in pounds), as required to be recorded in Section C.1.d, shall be summed for the calendar year and multiplied by a factor of 0.5**, for 50% solvent loss.
- iv. The total annual organic compound emission rate shall be the sum of the result from (i), (ii) and (iii), divided by 2,000 pounds per ton, and the result shall be multiplied by the allocation factor (0.279) for this emissions unit, as determined by the Printing Industry of Ohio's "Enviroprint" manual. .

*Pursuant to Ohio EPA Engineering Guide #68, lithographic sheetfed and non-heatset inks have a 5% solvent loss.

** Pursuant to Ohio EPA Engineering Guide #68, cleanup operations can assume 50% solvent loss if the cleanup towels are stored in closed containers and the cleanup solvents have a composite vapor pressure less than 10 mm of Hg at 20 degrees Celsius (68 deg. F). If either of the aforementioned do not apply, then the permittee shall assume 100% solvent loss for the affected cleanup material.

2. Formulation data or USEPA Method 24A shall be used to determine the organic compound contents of the inks, varnishes, fountain solutions and cleanup materials.

F. Miscellaneous Requirements

None.